

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

VERY REVEREND GEORGES F. de
LAIRE, J.C.L.,

Plaintiff,

v.

GARY MICHAEL VORIS, ANITA CAREY,
ST. MICHAEL'S MEDIA a/k/a CHURCH
MILITANT, and MARC BALESTRIERI

Defendants.

CIVIL ACTION NO. 1:21-cv-00131-JL

**THE VERY REVEREND GEORGES F. de LAIRE, J.C.L.'S MOTION FOR A
JUDGMENT OF LIABILITY**

Through this Motion, Plaintiff the Very Reverend Georges F. de Laire, J.C.L. ("Father de Laire") seeks a judgment of liability on Count I of his Amended Complaint for Defamation, as to Gary Michael Voris, Anita Carey and St. Michael's Media a/k/a Church Militant ("Defendants"). Judgment has already been entered in this matter as to the remaining defendant, Marc Balestrieri ("Balestrieri").

As set forth in the accompanying memorandum, Defendants' pattern of conduct has resulted in depriving Father de Laire of critical evidence in this case and warrants the extreme relief sought by this motion. Father de Laire notes that he has held off filing this motion while Defendants retained new counsel but cannot wait any longer where trial has now been set for February of 2024.¹

¹ In addition to the prejudice inflicted on Father de Laire, Defendants' actions have caused a significant increase in attorneys' fees and costs to respond to these issues, including additional discovery, repeated depositions, additional depositions, preparation for unattended depositions,

WHEREFORE, Father de Laire respectfully requests that the Court ALLOW his Motion and enter a judgment of liability as to Defendants, as well as an order for costs and attorneys' fees incurred in bringing this motion.

Dated: October 18, 2023

Respectfully submitted,

THE VERY REVEREND GEORGES F. DE LAIRE

By His Attorneys,

/s/ Joseph M. Cacace

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/s/ Suzanne M. Elovecky

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and motion practice. As a result of this, Father de Laire intends to, at the conclusion of this matter, bring a motion for attorney's fees and costs, and he reserves the right to do so.

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of October, 2023 a copy of the foregoing document was filed via ECF and transmitted to all counsel of record through that system.

/s/Suzanne M. Elovecky

Suzanne M. Elovecky

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